

My review of the draft EIR is limited to the following sections:

- 4.4 Greenhouse Gas Emissions
- 4.11 Transportation and Circulation
- 4.13 Water Quality and Supply
- 6.0 Project Alternatives

In support of these reviews (particularly section 4.11), a benchmarking analysis was conducted using the EIR and Conditional Use Permit for the SunPower – California Valley Solar Ranch (DRC2008-0097). The results of the benchmarking comparison are summarized in the tables below:

Assumptions used in EIR and Derived Data

	Sunpower-CVSR	Las Pilitas Quarry
Peak Daily Truck Trips [From EIR]	56	273
% Increase in Peak Daily Truck Trips due to Project [Calculated from EIR data]	25%	450%
Peak Hourly Truck Trips (AM) [From EIR]	11	38
% Increase in Peak Hourly Truck Trips (AM) due to Project [Calculated from EIR data]	45%	475%
Peak Hourly Truck Trips (PM) [From EIR]	6	30
% Increase in Peak Hourly Truck Trips (PM) due to Project [Calculated from EIR data]	42%	1200%
Duration of Project [From EIR]	30 to 36 months	28 to 56 years
Total Truck Trips for Duration of Project [Calculated from EIR data]	43,680	2.4 Million to 4.8 Million

The key “take-away” from the above table is that the increase in daily truck traffic associated with the Las Pilitas Quarry **will be on the order of 1.5 to 2 magnitudes (500% to 1000%) higher** than that associated with the construction of the Sunpower - California Valley Solar Ranch.

Additionally, the Traffic Management Plan required as a condition of approval of DRC2008-0097 stipulates that all site access from “non-oversized trucks that exceed the 30-foot KPRA Advisory for SR 58” (The class of truck which the Las Pilitas Quarry will use) shall be via SR 58 east of the project.

Put another way, a condition of approval for the SunPower – California Valley Solar Ranch project was that it would create NO increase in traffic in Santa Margarita of the types of trucks to be used for the Las Pilitas Quarry.

Comments on Draft EIR for Proposed Las Pilitas Quarry Project
Submitted by: Chris Neary

The Conditions of Approval implemented for DRC2008-0097 and the Conditions of Approval proposed in the Las Pilitas Quarry EIR are summarized in the table below:

	Sunpower-CVSR	Las Pilitas Quarry
Trucks may use exhaust ("jake") brakes only in emergencies	MM NS-1.49(c)	No Requirement
Implement Traffic Control Plan	MM TR-1.1	No Requirement
Implement site access routes to limit traffic impacts on associated roads	MM TR-1.1(a)	No Requirement
Implement warning signs, barricades and flaggers as necessary to control traffic	MM TR-1.1(c)	No Requirement
Implement signage to warn of project traffic on roadways	MM TR-1.1(d)	No Requirement
Implement signage along Highway 58 to notifying drivers of school entrance and school traffic	MM TR-1.1(f)	No Requirement
Prohibit construction on the day of the Wildflower Ride	MM TR-1.1(g)	No Requirement
Place steel rumble plates at mine and project entrance to recuse gravel, dirt and debris from entering Hwy 58	MM TR-1.1(i)	No Requirement
Construction deliveries via Hwy 41/46 shall be during off peak hours	MM TR-1.1(j)	No Requirement
No Truck deliveries on weekends	MM TR-1.1(j)	No Requirement
Applicant funds 2 additional CHP units on weekdays	MM TR-1.1(o)	No Requirement
Project truck drivers are informed as to project transportation restrictions	MM TR-1.1(o)	No Requirement
Restore roadway from damage due to project-related traffic	MM TR-1.2	No Requirement
Implement school bus traffic plan	MM TR-2.1	No Requirement
Signalize SR 58/EI Camino Real intersection	No Requirement	MM TRAFFIC-1a
Construct pedestrian refuge on EI Camino Real	No Requirement	MM TRAFFIC-2b
Obtain encroachment permit from Caltrans for project entrance	No Requirement	MM TRAFFIC-3a
Control off-site parking of trucks	No Requirement	MM TRAFFIC-3b

The contrast in mitigations between the two projects is stark.

Numerous substantial mitigations were implemented for the smaller impact, shorter duration, SunPower – California Valley Solar Ranch project, while only a handful of small mitigations are proposed for the Las Pilitas Quarry.

Suggested Action: The mitigations implemented for the SunPower – California Valley Solar Ranch project should be individually reviewed for applicability to the Las Pilitas Quarry in order to provide more comprehensive mitigation of its traffic impacts.

Suggested Action: Based on the contrast in quality of mitigations between the two projects, an internal benchmarking review of the EIR preparation process should be conducted to identify practices used in the preparation of DRC2008-0097 which could be used to improve the EIR for the Las Pilitas Quarry.

The remainder of my comments are referenced to the applicable section of the Draft EIR for the proposed Las Pilitas Quarry Project:

Comments concerning Section 4.4 (Greenhouse Gas Emissions)

Table 4.4-1, Policy AQ.1.7: The discussion and preliminary determination do not address the potential impacts of increased traffic on bicycle and pedestrian travel. The preliminary determination of “Potentially Consistent” is not supported.

Suggested Action: Revise preliminary determination for Policy AQ.1.7

Comments concerning Section 4.11 (Transportation and Circulation)

Section 4.11: The conclusions of the Transportation and Circulation portion of the EIR are based on Transportation Impact Analyses performed in 2006, 2009 and 2012. None of these analyses attempted to model project traffic impacts on I and H streets within Santa Margarita (i.e., “cut-through” traffic).

Suggested Action: Perform revised Transportation Impact Analysis incorporating methodology to measure traffic impacts on I and H streets within Santa Margarita

Similarly, none of the analyses evaluated bicycles. The studies are deficient because both the Syncro 7.0 traffic modeling software used and the referenced Highway Capacity Manual include provisions for incorporating both bicycle and pedestrians into the analysis process. Inclusion of bicycles in the analysis is warranted since the Hwy 58 is a designated Bicycle Route within the study area.

Supplemental bicycle and pedestrian counts were conducted in 2011, however the counts were not conducted when maximum recreational bicycle traffic would be expected (i.e. weekend day), nor was analysis of the results conducted.

The Federal Highway Administration “Bicycle Compatibility Index” methodology should also be implemented within the project traffic analyses to more fully assess potential project impact. Currently the EIR is deficient as it merely notes that SR 58 is a designated Bike Route but no attempt is made to assess the impact from the project.

Suggested Action(s): Perform bicycle and pedestrian counts as necessary to find peak weekly loads. Perform additional traffic modeling using Syncro 7.0 software or superior substitute and incorporate the additional bicycle and pedestrian counts. Report the effect of the project on bicycle traffic using Federal Highway Administration guidelines or similar criteria.

Page 4.11-3 discusses the Caltrans truck advisory for SR 58. The discussion states “Caltrans lists SR 58 from J Street eastward as a 30-foot KPRA advisory route”. This statement is consistent with Caltrans publications.

Subsequently in the para it is stated, “This listing means that trucks with a longer KPRA length may not be able to remain within their travel lane.” This statement is not correct, as the available Caltrans documents indicate that the actual advisory is for SR 58 is “KPRA for the route is less than 30 feet, but is posted as 30 feet”.

Therefore it is the official Caltrans assessment that trucks with a KPRA of less than 30 feet may have difficulty lawfully using the road.

Still later in the paragraph, it is stated: “Besides the 90-degree curve on SR 58 at J Street where the advisory begins, there are two other segments of steep curves along that highway that are subject to this listing.” This statement is not correct, as all available Caltrans documents indicate that entire length of SR 58 from J Street in Santa Margarita to the Kern County line is subject to the advisory.

Suggested Action: Revise page 4.11-3 as necessary to be consistent with available Caltrans requirements.

Suggested Action: Applicant to either provide technical justification of existing SR 58 conditions or fund SR 58 improvements to permit Caltrans to remove the truck advisory on SR 58 to the project site.

Pages 4.11-7 & 8 discuss the intersection of El Camino Real and Estrada. The EIR states "...the minimum distance between the center of the nearest railroad track and the stop line should be 140 feet. On Estrada Avenue, this distance is about (emphasis added) 78 feet: more than enough to accommodate a large truck...".

The actual distance between the stop line at El Camino Real and the stop line for the railroad crossing barrier (as measured from aerial photographs) is only 60 feet.

Caltrans regulations indicate trucks associated with this project could be up to 75 feet in length. Therefore, at least some trucks will not physically fit between the stop line and the adjoining railroad tracks, creating an unacceptable safety hazard.

Suggested Action: Applicant to limit truck size as necessary to avoid interference with railroad tracks during normal traffic conditions.

Suggested Action: Applicant to modify El Camino Real/Estrada intersection to increase space available between stop line and adjoining railroad tracks.

The EIR correctly states "El Camino Real makes a sweeping bank curve as it enters the eastern portion of Santa Margarita..." but no assessment of the impact of this configuration on traffic is made. Observation of the adjoining intersection between El Camino Real and Estrada clearly shows that for this curve, the adjacent heavy vegetation impairs the line of sight from westbound El Camino Real to Estrada and vice versa. Most project traffic will consist of slow moving trucks turning from El Camino onto Estrada and vice versa.

Suggested Action: Applicant to fund a left-turn pocket on El Camino Real at the El Camino Real/Estrada intersection.

Section 4.11.6 states: "The remaining items from the Initial Study (g, dealing with plans for alternative transportation...were identified as not involving a significant impact". As has been discussed elsewhere in these comments, no basis exists for this conclusion.

Suggested Action: Provide analysis of potential impacts on item g, Alternative Transportation, in the EIR.

Section 4.11.5 states that the project will have a significant impact if it will "create unsafe conditions on public roadways (e.g, limited access, design features, sight distance, slow vehicles).

However page 4.11-22 states that "Truck traffic is generally slower than the passenger vehicles from residential uses". This statement indicates that a significant impact will be created, though the EIR attempts to use the statement to argue the opposite.

Additionally, the traffic modeling performed in support of the EIR does not appear to incorporate the slower truck speeds credited above into the model.

Suggested Action: Correct EIR to be consistent and in conformance with County of San Luis Obispo CEQA Guidelines.

Suggested Action: Re-perform Traffic Analysis, incorporating lower truck speeds into traffic analysis computer model.

On page 4.11-22, The EIR states that in order to negotiate the SR 58 curve at J Street, “The radius of curvature for the roadway at this location is adequate to accommodate large trucks within the travelled lane, with possible use of the paved shoulder by some trucks, without “offtracking” outside of the travelled lane (see Figure 4.11-5).

Analysis of Figure 4.11-5 combined with measurements at the SR 58 curve found:

- Trucks inbound to Santa Margarita will travel laterally outside the travel lane by at least 6 feet. This will place them beyond the edge of the highway.
- Trucks outbound from Santa Margarita will travel laterally outside the travel lane by at least 9 feet. This movement may place them beyond the edge of the highway.
- Trucks inbound to Santa Margarita will travel outside the travel lane for a distance of at least 325 feet.
- Trucks outbound from Santa Margarita will travel outside the travel lane for a distance of at least 550 feet.
- Both inbound and outbound trucks will track off the paved roadway surface at some points in the curve.
- Any modification of the tracks for either inbound or outbound trucks to reduce travel outside the lane into the shoulder area and the adjacent unpaved surface results in movement of the track into the opposing lane for a portion of the curve (i.e, there is no margin in the track)
- The length of the trucks shown in Figure 4.11-5 is 69 feet, however Caltrans regulations indicate the maximum truck size could be as long as 75 feet. This discrepancy results in Figure 4.11-5 showing non-conservative results.

Additionally, the following points are pertinent:

- Figure 4.11-5 does not include any tolerances for variation in truck turning. The figure represents a “best case” assessment. Under normal conditions, it is unreasonable to expect all trucks will follow the track shown in Figure 4.11-5. Some trucks will track further onto the shoulder and adjacent unpaved surface, while others will track into the oncoming traffic lane.
- Travel outside the CVC defined highway, as will be necessary for trucks inbound to Santa Margarita and may occur for trucks outbound from Santa Margarita, is a citable traffic offence.
- The EIR does not attempt to calculate how often opposing traffic will encounter a truck traveling in the opposite direction through the J Street curve. Using EIR data and assuming that average traffic velocity along SR 58 east of Santa Margarita is 50 MPH, it is readily determined that 8% of vehicles traveling on SR 58 during the hours of quarry operation will encounter a truck attempting to maneuver through the corner. Put another way, on a daily basis it should be expected that there will be at least 75 instances of a truck maneuvering through the J Street corner at the same time opposing traffic is in the corner. At least 21 of the vehicles in the opposing lane will be other quarry trucks.

Suggested Action: Revise Figure 4.11-5 using correct maximum length for trucks. Revise associated sections of EIR as necessary based on revised Figure.

Suggested Action: Applicant to modify SR 58 at J Street corner as necessary to assure lawful operation of project traffic is possible.

Suggested Action: Revise page 4.11-22 as necessary to correctly address expected impact from project traffic at J Street corner.

Page 4.11-23 determines that no improvements to SR 58 at the quarry entrance are necessary for traffic present during normal quarry operations. Page 4.11-24 assesses the effect of instances when larger numbers of trucks are operating, but no assessment of the adequacy of SR 58 at the quarry entrance is performed for this scenario.

Suggested Action: Revise page 4.11-24 as necessary to assess adequacy of SR 58 at the quarry site entrance under peak usage conditions.

Page 4.11-25 states “the overall percentage of heavy truck traffic on SR 58 and the area roadways is expected to remain in the existing 3 percent range”.

The data presented in the EIR indicates the existing daily truck traffic on SR 58 east of Santa Margarita is approximately 28 vehicles.

The Project traffic analysis assumes 273 peak daily truck trips. Adding this value to the existing truck traffic results in a determination that trucks would represent over 32% of total traffic. Therefore the EIR statement that “truck traffic on SR 58 ...is expected to remain in the existing 3 percent range” is not correct.

Suggested Action: Revise page 4.11-25 as necessary to correctly account for expected project traffic.

The Cumulative Effects assessment does not incorporate methodology to measure the proportionate impact of large trucks on pavement deterioration. The consensus among engineering studies is the travel of a single large truck is equivalent to that of at least 1900 cars. Based on the traffic data presented in the EIR, it is readily determined that traffic associated with the quarry will be responsible for over 90% of the traffic-induced damage to SR 58 east of Santa Margarita.

Suggested Action: Revise Cumulative Effects analysis to address expected pavement damage from project.

Suggested Action: Project to perform baseline study of SR 58 pavement condition and perform remediation work on appropriate schedule as necessary to repair pavement damage due to project and restore condition of SR 58 to pre-project state.

Page 4.11-28 states “On the right angle turn of SR 58 at J Street, although future traffic from the Santa Margarita Ranch Agricultural Residential Cluster Subdivision may cause a significant impact due to its contribution towards unsafe conditions at this location, the proposed quarry traffic will involve slower moving trucks. The project may not improve the situation at this turn, but it should not exacerbate it”.

The contention that a “slower moving truck” will not contribute to unsafe conditions at a sharp, difficult to navigate corner is, frankly, ludicrous and fails under the most cursory evaluation.

Suggested Action: Revise Cumulative Effects analysis to properly address expected safety impact from Project at the J Street corner.

Page 4.11-29 states the project would be responsible for 8.1% of the funding for possible intersection improvements based on estimated 2030 traffic volume.

This assessment is non-conservative because it does not account for the disproportionate impact of large, ungainly trucks on local traffic.

Suggested Action: Revise Cumulative Effects analysis to properly address expected traffic funding contribution from project based on realistically weighted effect on traffic conditions.

Table 4.11-7 summarizes County circulation policies and reaches preliminary determinations of the effect of the project on these policies.

The proposed project is inconsistent with Principle 5, Policy Statement 4 since the extremely large traffic volumes strongly discourage use of alternative transportation along SR 58.

The proposed project is inconsistent with Chapter 5, Element C Item 2 since it will produce an unmitigatable traffic impact due to growth at an inappropriate location.

The proposed project is inconsistent with Chapter 5, Element C Item 7 since the project will create unsafe conditions at the J Street curve and elsewhere along the project access route due to the extremely large traffic volumes associated with the project.

The proposed project is inconsistent with Chapter 5, Element C Item 9 since the extremely large traffic volumes associated with the project substantially detract from the suggested scenic corridor along SR 58.

Suggested Action: Revise Table 4.11-7 as necessary to properly address project impacts and revise Preliminary Determinations accordingly.

Comments concerning Section 4.13 (Water Quality and Supply)

Pages 4.13-4 and 4.13-5 describe the permit requirements applicable to Santa Margarita Reservoir for maintenance of surface stream flow in the Salinas River downstream of the reservoir, but no assessment is performed to examine if the project would require additional releases from Santa Margarita Reservoir in order to maintain permitted conditions.

Suggested Action: Revise Section 4.13 as necessary to assess potential impact of the project on necessary downstream releases from Santa Margarita Reservoir.

Comments concerning Section 6.0 (Project Alternatives)

Section 6.8 addresses alternative access routes to the Project, but the evaluated alternatives are limited to road access.

Implementation of conveyer systems and remote loading facilities either in conjunction with or in proximity to the Hanson operations should be evaluated as an alternative. Conveyers could offer all the advantages of the already evaluated alternative access routes with decreased environmental and traffic impacts.

Suggested Action: Revise Section 6.8 as necessary to evaluate integration of conveyer systems into alternative quarry access schemes.